

UNITED STATES DISTRICT COURT  
for the  
Eastern District of California



FILED  
Feb 03, 2025  
CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

United States of America )  
v. )  
Jafaar Nyangoro ) Case No. 1:25-mj-00006-BAM  
)  
)  
)  
)  
)  
\_\_\_\_\_  
)

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September through October of 2020 in the county of Fresno in the  
Eastern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1349	Conspiracy to commit wire fraud Maximum Penalties: -Twenty Years in prison - Fine of \$250,000 - Three Years Supervised Release - Special Assessment of \$100

This criminal complaint is based on these facts:

See attached affidavit, which is incorporated by reference as though fully set forth herein.

Continued on the attached sheet.

Complainant's signature

Jessica Downing, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/31/2025

Judge's signature

City and state: Fresno, California

Barbara A. McAuliffe - U.S. Magistrate Judge

Printed name and title

1                   **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

2                   I, Jessica Downing, being duly sworn, affirm the following:

3                   **I. INTRODUCTION**

4                   1.       I am a special agent (SA) with the Federal Bureau of Investigation (FBI). This affidavit is  
5 made to support a complaint charging **JAFAAAR SEPTEMBER NYANGORO** with conspiracy to  
6 commit wire fraud in violation of 18 U.S.C. § 1349.

7                   1.       I am a federal law enforcement officer as defined under Rule 41(a)(2)(C) and an  
8 “investigative or law enforcement officer” within the meaning of 18 U.S.C. § 2510. I am authorized to  
9 request this complaint because I am a government agent who is engaged in enforcing federal criminal  
10 laws, and I am within the category of officers authorized by the United States Attorney General to  
11 request a complaint and to make arrests for the offense described in this affidavit. I am a Special Agent  
12 with the Federal Bureau of Investigation and have been since June 6, 2021. I am currently assigned to  
13 the FBI’s Sacramento Field Office, where I work as part of the Cyber Task Force. In this role, I  
14 specialize in the investigation of computer and high-technology crimes such as computer intrusions,  
15 ransomware attacks, and other types of malicious cyber-related activity. I have received training in  
16 interviewing and interrogation techniques, arrest procedures, search and seizure, computer crimes,  
17 search warrant applications, electronic and physical surveillance procedures, and other investigative  
18 methods and techniques at the FBI’s Academy in Quantico, Virginia. Since my assignment to the  
19 Sacramento Field Office, I have received additional formal and informal training from the FBI, and  
20 other organizations, regarding cyber analytic skills and investigations, and have worked matters  
21 involving cyber actors and computer network exploitation activity.

22                  2.       I am familiar with the facts and circumstances of this investigation. The facts set forth in  
23 this affidavit are based on my personal observations, knowledge obtained from other law enforcement  
24 officers, my review of documents related to this investigation, conversations with others who have  
25 personal knowledge of the events and circumstances described herein, and a review of open-source  
26 information including information available on the Internet. Because this affidavit is submitted for the  
27 limited purpose of establishing probable cause in support of an application for a criminal complaint, it  
28 does not set forth each and every fact that I or others have learned during the course of this investigation.

1                   **II. CONSPIRACY TO COMMIT WIRE FRAUD**

2         3. Title 18, United States Code, Section 1349 provides that anyone who attempts or  
3 conspires to commit wire fraud in violation of 18 U.S.C. § 1343 shall be imprisoned up to twenty years,  
4 fined up to \$250,000, or both.

5         4. Title 18, United States Code, Section 1343 provides that whoever, having devised or  
6 intending to devise any scheme or artifice to defraud, or for obtaining money or property, by means of  
7 false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by  
8 means of wire, radio, or television communication in interstate commerce, any writings, signs, signals,  
9 pictures, or sounds for the purpose of executing such scheme or artifice, is guilty of wire fraud.

10                  **III. PROBABLE CAUSE**

11                  **A. Overview of Investigation**

12         5. The FBI has been investigating a fraud scheme in which the County of Fresno was  
13 victimized in October of 2020. In brief, an email account of an employee of Turning Point Solutions of  
14 Central California (Turning Point) was compromised by a cyber threat actor. This threat actor used the  
15 compromised account to initiate communications with the County of Fresno and directed the county to  
16 accept a new Automated Clearing House (ACH) form for use in sending payments for services provided  
17 by Turning Point. The account information on this ACH form matched that of an account owned and  
18 controlled by NYANGORO. Funds from the County of Fresno, intended for Turning Point, were instead  
19 transferred to NYANGORO's account. Additionally, screenshots of the payment advices for the  
20 payments received in NYANGORO's account from the County of Fresno were found in NYANGORO's  
21 Apple iCloud account. Finally, messages were found in NYANGORO's iPhone in which confirmed that  
22 NYANGORO and a co-conspirator, PETER BAH ACHA, discussed details of the wire fraud.

23                  **B. Business Email Compromise Schemes**

24         6. A business email compromise (BEC) is a sophisticated scam targeting businesses and  
25 individuals that regularly perform wire transfer or ACH payments. A BEC scammer attempts to use  
26 email in order to defraud a business or individual of money. To conduct a BEC, scammers may spoof an  
27 email account or website, send spear-phishing emails, or use malware to infiltrate company networks  
28 and gain access to legitimate email threads about billing and invoices.

**Figure 1- Copy of ACH form submitted to Fresno County by Compromised Account**

 Oscar J. Garcia, CPA  
Auditor-Controller/Treasurer-Tax Collector

County of Fresno  
Automated Clearing House  
Authorization Form

<b>Section 1 – Company Information (please type or print)</b>	
Name of Company: <u>Turning Point of Central California, Inc.</u>	
Doing Business As (DBA): <u>Turning Point of Central California, Inc.</u>	
County Contract Number: <u>02224582</u>	
Vendor Number (if known): _____	
Contact Person per Contract: <u>David Lonazo</u>	
Contact Phone Number per Contract: <u>304-903-4181</u>	
Contact E-Mail per Contract: <u>dlozano@tpocc.org</u>	
<b>Section 2 – Company Banking Information</b> <input checked="" type="checkbox"/> Checking Account <input type="checkbox"/> Savings Account	
Financial Institution: <u>Regions Bank</u>	
Account Number: <u>0289519361</u>	
Routing Number: <u>064000017</u>	
<b>Section 3 – Invoice Processing - Contact Person</b>	
Name of Contact Person: <u>David Lonazo</u>	
E-Mail Address: <u>dlozano@tpocc.org</u> <small>(Limited to only one email address in this section)</small>	
<b>Section 4 – Authorized Signer per Contract (please sign)</b>	
Signature: <u></u> Date: <u>09-14-2020</u>	
Printed Name/Title: <u>David Lonazo</u>	
<b>Section 5 – Remit to</b>	
Electronically: <u><a href="mailto:ACTCAP-ACH@fresnocountyca.gov">ACTCAP-ACH@fresnocountyca.gov</a></u>	
Mail: ACTTC - General Accounting / PO Box 1247 / Fresno, CA 93715-1247	

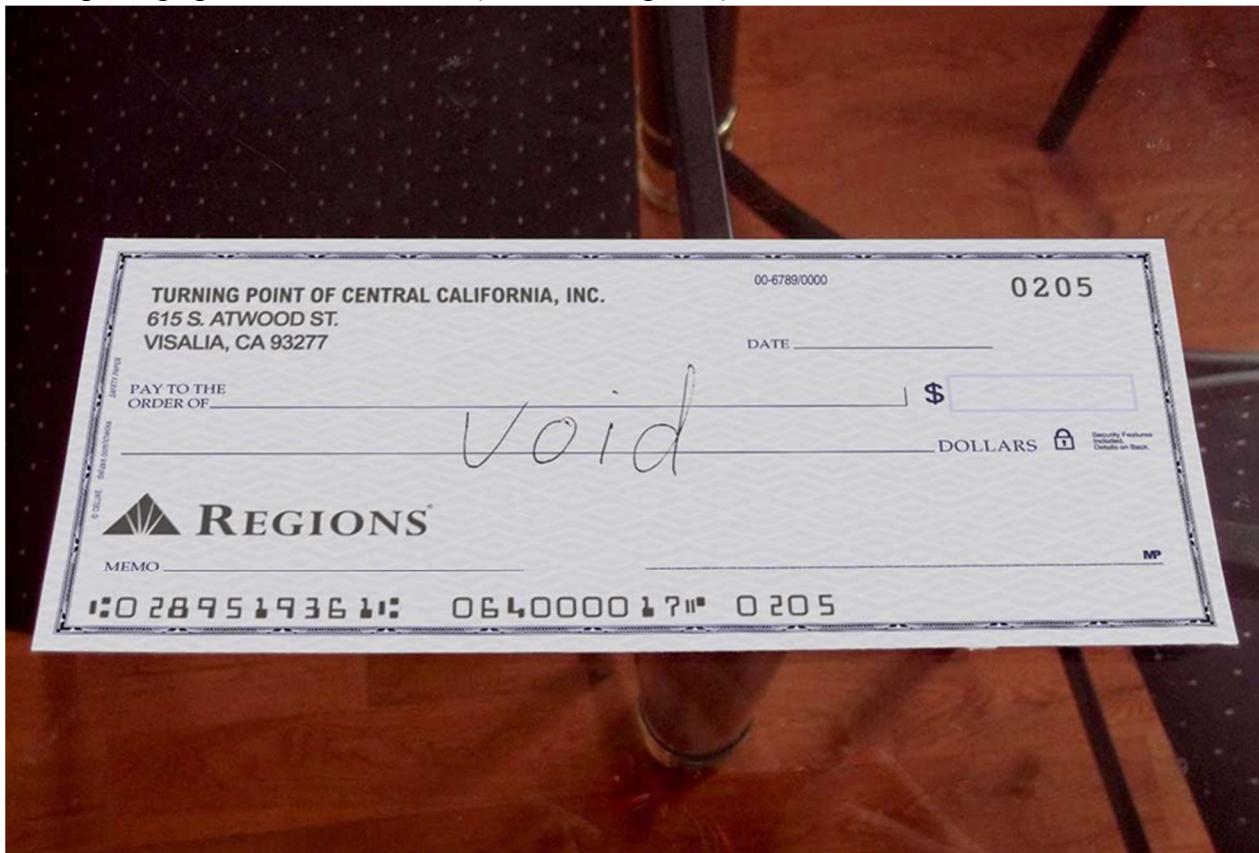
**C. County of Fresno BEC**

7. On September 14, 2020, Fresno County employee Joshua McIllwain (McIllwain) contacted Turning Point Finance Director David Lozano (Lozano) by email to advise him of an upcoming ACH payment from Fresno County to Turning Point, for \$708,533.89. McIllwain received a reply from what he believed to be Lozano's email account (referenced below as the "Compromised Account") to stop the scheduled ACH payment, as the account information had changed. An updated ACH form was provided to McIllwain and Fresno County from the Compromised Account (as seen in Figure 1 above).

8. After receiving the updated ACH form, McIllwain forwarded the email chain to Fresno County employees Steven Machado (Machado) and Patricia McKay (McKay), in the Account and Auditing Departments to review. McIllwain copied as a recipient the Compromised Account on that

1 message.

2       9. After receiving the email chain, McKay began to communicate (by email) with the  
 3 Compromised Account. Later that day, McKay received a call from someone using phone number 304-  
 4 903-4181. The caller identified himself as Lozano and referenced the emails concerning the updated  
 5 ACH form. The caller was instructed to provide a copy of a voided check for the updated ACH form to  
 6 be processed. Someone using the Compromised Account then re-sent the ACH form (as seen in Figure  
 7 1), with a photograph of a voided check (as seen in Figure 2).



21       **Figure 2- Photograph of voided check, provided to Fresno County by Compromised Account**

22       10. Between September 15-22, 2020, someone using the Compromised Account continued to  
 23 email McKay and other Fresno County employees, to request that all payments be sent to the bank  
 24 account provided on the updated ACH form. Kimberly Lamanuzzi (Lamanuzzi), supervisor of McKay,  
 25 communicated to the user of the Compromised Account that updates to ACH payment information  
 26 typically took 3-5 business days to process.

27       11. On September 24, 2020, Fresno County initiated an ACH transfer of \$274,979.23,

1 intended for Turning Point, to Regions Bank account 289519361 (the account number listed on the  
2 updated ACH form). Rather than going to Turning Point, the funds went to the bank account (at  
3 Regions Bank) controlled by NYANGORO. On dates between September 25 and October 13, 2020,  
4 another four transfers were made from Fresno County to Regions Bank account 289519361, totaling an  
5 additional \$1,391,427.49.

6 12. On October 12, 2020, Bruce Tyler (Tyler), financial director for Turning Point, informed  
7 Fresno County employees that Turning Point had not received any payments from Fresno County. Tyler  
8 informed Fresno County that Turning Point's banking information had not changed in recent months,  
9 and that Turning Point did not have an account with Regions Bank. After receiving this information,  
10 Fresno County initiated an internal investigation and then contacted the Fresno FBI office on October  
11 13, 2020.

12 13. FBI Task Force Officer (TFO) O'Neil examined the email header information for the  
13 communications from the Compromised Account to Fresno County employees between September 14  
14 and October 14, 2020. Header information refers to the block of data (or packet of information)  
15 attached to every e-mail message sent and contains the metadata that facilitates the process of an email  
16 travelling to its recipient, such as information on the source address, destination address, and routing  
17 information. TFO O'Neil's examination showed that the origin Internet Protocol (IP) addresses (the  
18 addresses from which the emails from the Compromised Account were sent) were connected to multiple  
19 Virtual Private Network (VPN) services located outside of the United States. VPN services can be used  
20 to mask a user's IP address. Typically a paid service, the individual's true IP address is connected to a  
21 VPN server, which then obfuscates an IP address before connecting the user to other addresses on the  
22 internet.

23 14. The examination of the email headers also showed that emails sent to the  
24 dlozano@tpocc.org account were being forwarded to a Google account associated with email address  
25 oneil.edwad@gmail.com. Google LLC, in response to a search warrant (Warrant ID 000027298, issued  
26 by Judge Gary Hoff of the Fresno County (California) Superior Court, on July 2, 2021) for content from  
27 this email account, returned evidence that the owner of the account was using a keylogger to capture  
28 login credentials of other internet users. A keylogger is a computer program that captures the individual

1 keystrokes made by an internet user and is typically used to capture (or steal) a user's passwords and  
2 account information. Keyloggers are typically deployed via phishing emails. Phishing emails are emails  
3 that employ social engineering tactics to encourage recipients to click on malicious links, often leading  
4 to the capture of personal information, or the deployment of malicious software on a victim's computer.  
5 Many emails containing login credentials for a variety of internet users were found in the Google LLC.  
6 search warrant return for the oneil.edwad@gmail.com account. Additionally, copies of email messages  
7 sent to dlozano@tpocc.org between September 14 and October 14, 2020, were found in the account.

8       15. After noting that a VPN was used to send the emails from the Compromised Account to  
9 Fresno County employees, TFO O'Neil interviewed Lozano in person. During this interview, Lozano  
10 stated that he had never used a VPN to access his accounts, nor had he traveled outside of the country  
11 during the time period in which the emails were exchanged. Lozano denied having sent any of the  
12 emails to Fresno County employees on dates between September 14 and October 14, 2020. Additionally,  
13 IP addresses found in header information taken from emails sent from Lozano's email account prior to  
14 September 14<sup>th</sup>, 2020, did not match those sent to Fresno County employees from September 14-  
15 October 14, 2020. This also suggested that his account was compromised during this period.

16       16. In addition to an analysis of the e-mail header information, TFO O'Neil and I examined  
17 other inconsistencies in the communications between the Compromised Account and Fresno County  
18 employees. First, the last name "Lozano" was misspelled on the ACH form sent by the user of the  
19 Compromised Account. Additionally, Regions Bank account number 289519361, listed on the ACH  
20 form, was later identified as being registered to JSN Ventures, a business account held by  
21 **NYANGORO**. Finally, the telephone number listed on the form, 304-903-4181, was found, via open-  
22 source database checks, to be registered to Bandwidth LLC. Representatives from Bandwidth LLC.  
23 informed TFO O'Neil that the phone number was leased to TalkTone as a voice-over internet protocol  
24 (VOIP) number. VOIP is a service that facilitates phone calls over the internet rather than traditional  
25 phone lines. TFO O'Neil obtained from TalkTone the registration email for the VOIP number 304-903-  
26 4181. The registration email address was jackauto20004@gmail.com.

27       17. TFO O'Neil obtained content from the jackauto20004@gmail.com account from Google  
28 LLC. TFO O'Neil analyzed that content and learned that MUNIRU SHIELU was the owner of the

1 account. SHIELU is listed as a subject in numerous FBI investigations in the New York, D.C., Boston,  
 2 and Salt Lake City offices.

3 **D. Summary of NYANGORO's Involvement**

4 18. On July 1, 2021, Regions Bank was served with a subpoena for documents, records, and  
 5 images from accounts held by **NYANGORO** and JSN Ventures. Records for Regions Bank account  
 6 number 289519361 revealed that it was registered to JSN Ventures. The account was opened on July 27,  
 7 2020, and the address provided for the account was 404 Vienna Ct, Franklin, TN, previously identified  
 8 as the primary residence of **NYANGORO** through open-source reporting as well as prior search  
 9 warrants executed by the Franklin Police Department of Tennessee. Contact information provided for  
 10 the account included phone number 615-538-8363, and email address [nyangoroseppy@gmail.com](mailto:nyangoroseppy@gmail.com).  
 11 Credits from Fresno County were found in the account, as detailed in Figure 3 (below):

Date	Description	Credit Amount
09/24/2020	County of Fresno ACH Account to Turning Point 0000005953	\$274,979.23
09/25/2020	County of Fresno ACH Account to Turning Point 0000005953	\$101,431.55
10/06/2020	County of Fresno ACH Account to Turning Point 0000005953	\$1,165,438.08
10/07/2020	County of Fresno ACH Account to Turning Point 0000005953	\$11,136.42
10/13/2020	County of Fresno ACH Account to Turning Point 0000005953	\$113,421.441

19 **Figure 3- Table showing wire transfers from Fresno County to Regions Bank account 0289519361**

20 19. TFO O'Neil conducted an open-source database check for phone number 615-538-8363  
 21 and found that it belonged to **NYANGORO**. A subpoena served to Google LLC, showed that  
 22 **NYANGORO** was listed as the subscriber for the email address nyangoroseppy@gmail.com. A phone  
 23 number of 629-221-0947 was also listed within the subscriber information for the email account.  
 24 Subpoena returns from Comcast and Xfinity Mobile, confirmed that this number was registered to  
 25 **NYANGORO**. The e-mail address, seppy.nyangoro@gmail.com, was listed as a recovery email for the  
 26 nyangoro.seppy@gmail.com account. Subscriber information for this e-mail also listed **NYANGORO**

1 as the subscriber for the account.

2       20. TFO O'Neil searched registered businesses on the website for the Tennessee Secretary of  
 3 State (sos.tn.gov) for JSN Ventures. He found filing information for JSN Ventures, Inc., which listed the  
 4 registered agent of JSN Ventures as **JAFAAAR SEPTEMBER NYANG'ORO** with the address 404  
 5 Vienna Court, Franklin, Tennessee. The business was formed on June 19, 2020.

6       21. Regions Bank provided records in response to a grand jury subpoena that revealed that  
 7 the funds transferred by Fresno County into Regions Bank account 289519361 were quickly transferred  
 8 out of the account. I tracked these funds into other Regions Bank accounts held by **NYANGORO**. Some  
 9 of the funds were then transferred to unknown individuals using third party remittance services, while  
 10 other funds were withdrawn as cash or by check. Remittance services allow individuals in the United  
 11 States to transfer funds to individuals and companies in foreign countries. The movement of the funds  
 12 out of Regions Bank account 289519361, and into subsequent accounts and/or other forms of  
 13 withdrawals, is summarized in Figure 4. The "Debit" column in Figure 4 does not account for beginning  
 14 account balances:

Account/Label	Credit	Debit
Regions Bank account 289519361	\$1,666,406.72 (from Fresno County ACH)	\$166,934.02 (to Regions Bank account 273797227)
Regions Bank account 273797227	\$166,934.02 (from Regions Bank account 289519361)	<ul style="list-style-type: none"> <li>• \$588,180 (to Ascend Federal Credit Union account 2105472095)</li> <li>• \$96,797.83 (to Regions Bank account 294163278)</li> <li>• \$973,561.41 (other wire transfers)</li> <li>• \$6,888 (withdrawals)</li> </ul>
Regions Bank Account 294163278	\$96,797.83 (from Regions Bank account 294163278)	\$99,656.91 (checks)
Ascend Federal Credit Union account 2105472095	\$588,180 (from Regions Bank account 273797227)	<ul style="list-style-type: none"> <li>• \$550,500 (wire transfers)</li> <li>• \$21,808 (checks)</li> <li>• \$26,800 (cash withdrawals)</li> </ul>

24       **Figure 4- Table summarizing the movement of funds from accounts owned by NYANGORO**  
 25  
 26       between September 24, 2020, and December 15, 2020.

27       22. Records received in response to a grand jury subpoena served to Regions Bank for  
 28 account 273797227, showed that the account was registered to JSN Ventures. The address provided for  
 the account matched that of the primary residence of **NYANGORO**, 404 Vienna Court, Franklin, TN.

1 Additionally, the account provided an email address of nyangoroseppy@gmail.com, and a phone  
2 number of 615-538-8363. This contact information was found to belong to **NYANGORO**, based on  
3 returns from subpoenas served to Google LLC and Xfinity. The same subpoena to Regions Bank  
4 showed that account 294163278 was registered to **JAFAAR S. NYANGORO**.

5 23. Records received in response to a grand jury subpoena served to Ascend Federal Credit  
6 Union, showed that account 2105472095 was registered to **JAFAAR S. NYANGORO**.

7 **NYANGORO's** Social Security Number and Driver's License were listed on the opening documents for  
8 the account.

9 24. Judge Gregory Fain of the Fresno County (California) Superior Court issued a search  
10 warrant on June 24, 2021, to Apple Inc., for data from accounts held by **NYANGORO**. Those accounts  
11 had been identified after the service of a grand jury subpoena. The accounts included Apple  
12 Identification Numbers (IDs) 2435746153 (seppy.nyangoro@icloud.com), 16640820106  
13 (seppy305@icloud.com), and 12033517462 (justin.nyangoro@icloud.com). Apple IDs are assigned by  
14 Apple Inc. to individual accounts as unique identifiers. I reviewed documents, photographs, images, and  
15 other data from these accounts, and found photographs of payment advices received from Fresno  
16 County, verifying payments to Regions Bank Account 0289519361 (such as that shown in Figure 5  
17 below).

18

19

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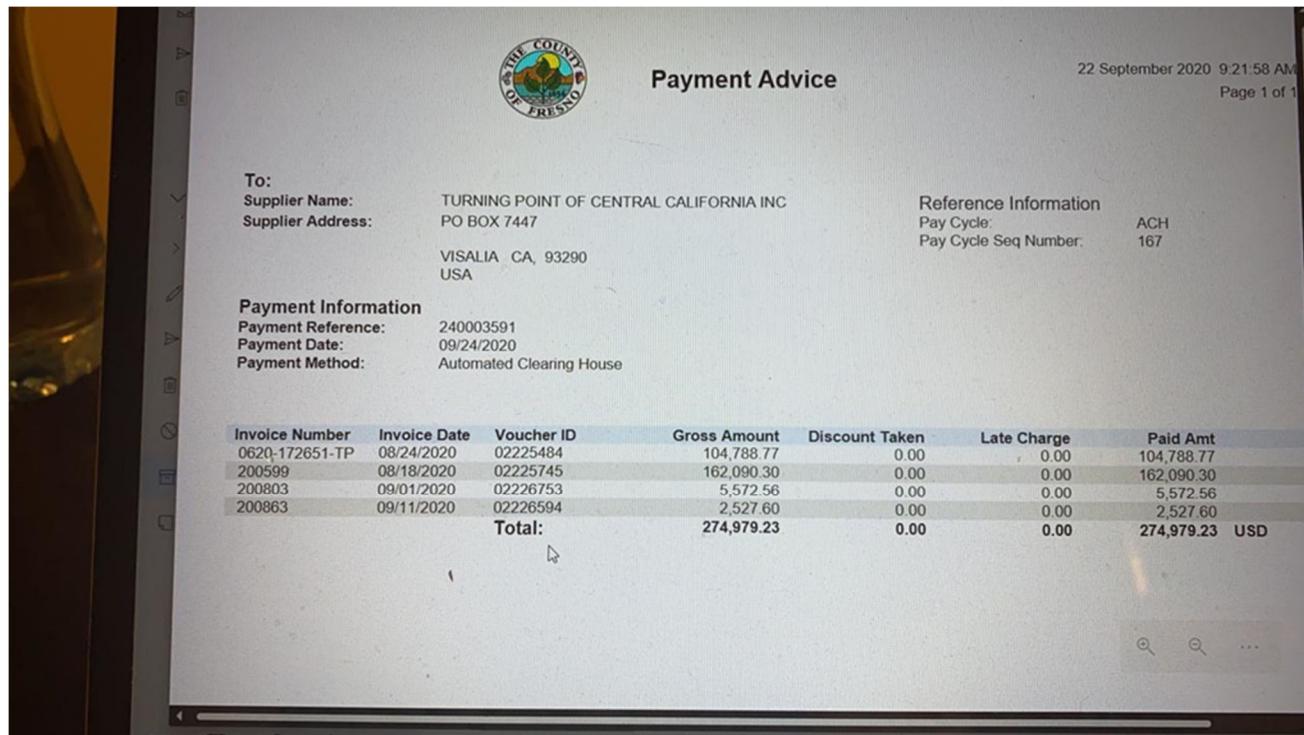
23

24

25

26

27



**Figure 5- Photograph of Payment Advice found in an Apple Account held by Nyangoro**

25. In my review of the search warrant returns from Apple Inc., I also observed screenshots  
 14 of WhatsApp conversations between **NYANGORO** and other individuals, such as the one transcribed  
 15 below. WhatsApp is a freeware, cross-platform, centralized instant messaging and voice-over-IP service  
 16 owned by United States tech conglomerate Meta Platforms. It allows users to send text, voice messages  
 17 and video messages, make voice and video calls, and share images, documents, user locations, and other  
 18 content. This conversation appeared to be between **NYANGORO** and an individual identified on the  
 19 screenshot as “Tony”:

21 Tony: So u can send two checks smaller and bigger so we gone try  
 22 another way in my end see if I can cash it  
 23 Tony: Bro Idk whas the max These guy even if u tell em u have \$1 billion  
 24 they will tell u to bring it they will cash it  
 25 Tony: U know how ppl are  
 26 Tony: But you understand what I'm saying though  
 27 **NYANGORO:** Ask them  
 28 **NYANGORO:** Bcos we can do some serious damage

1                   **NYANGORO:**     Please get back to telegram

2                   Tony:               Ok

3                   Tony:               Yes they can I already told em I got \$850k coming after this one

4                  26.    In the conversation above, “Tony” asked **NYANGORO** to send him two checks

5 (assumed to be for monetary funds). Tony stated that one check should be for a larger amount, and one  
 6 for a smaller amount, so that he could try to cash both. Tony appeared to be unsure how large of a check  
 7 he would be allowed to negotiate. **NYANGORO** responded that Tony should ask about cashing the  
 8 check first, and then instructed Tony to switch to using Telegram as opposed to WhatsApp. Telegram  
 9 Messenger is a globally accessible, free, encrypted, cloud-based and centralized instant messaging  
 10 service. The application also provides optional end-to-end encrypted chats and video calling, VoIP, file  
 11 sharing and several other features. Based on my training and experience, Telegram is preferred by  
 12 criminals as Telegram does not store, or release, any information to law enforcement.

13                27.    FBI TFO Walden O’Neil checked the file properties of the photograph of the voided  
 14 check seen above in Figure 2. File properties are attached to all items created on a computer, and contain  
 15 information about the type of file, size of the file, and dates of when the file was modified. In this  
 16 instance, the file properties of the voided check showed that it had been modified by a program called  
 17 “Adobe Photoshop CC 20”. In his examination, TFO O’Neil also noted that the words  
 18 “deluxe.com/checks” were written perpendicularly along the left side of the check. He visited the  
 19 Deluxe Checks website, and found that the website allowed users to manually enter check information to  
 20 see a preview of what their checks would look like. Based on my training and experience, I believe this  
 21 information indicates that the voided check provided to Fresno County was first drafted using  
 22 “deluxe.com/checks” and then digitally modified using Adobe Photoshop, in order to appear real.

23                28.    In researching **NYANGORO**’s history, I learned that the FBI Memphis Field Office,  
 24 Nashville Resident Agency, investigated **NYANGORO** in 2016. At the time, a report was received by  
 25 Nashville agents of a BEC similar in nature to that described above. The report described a business  
 26 transaction in which an individual, Richard Bacon (Bacon), was selling two properties using the services  
 27 of an attorney, Floyd Flippin (Flippin). During the course of the investigation, FBI Nashville determined  
 28 that Flippin’s email address was compromised and used to send a fraudulent request to the buyer of the

1 properties, updating the banking information for deposit of the purchase amount from Regions Bank to  
2 SunTrust Bank. Based on these emails, the buyer wired \$1.9 million to the new SunTrust Bank account.  
3 Nashville agents later determined the SunTrust Bank account that received the \$1.9 million was held and  
4 controlled by **NYANGORO**.

5 29. On August 18, 2023, I spoke with Detective Elijah Valimont of the Franklin Police  
6 Department in Tennessee. Detective Valimont updated me on an investigation he helped conduct against  
7 **NYANGORO** for violations of Tennessee state law, such as criminal simulation related to passport  
8 forgery and the distribution of fraudulent monetary instruments. Detective Valimont informed me that  
9 **NYANGORO** was found guilty in a trial that concluded on August 18, 2023. **NYANGORO** faced trial  
10 in the state of Tennessee, Williamson County Circuit Court, for six counts of criminal simulation, one  
11 count of theft over \$1000 but less than \$2500, and one count of delivery of schedule IV drugs. After  
12 being found guilty, **NYANGORO** was remanded into custody and booked into the Williamson County  
13 Jail.

14 30. On October 7, 2024, **NYANGORO** also pled guilty to a Class C Felony involving  
15 identity theft trafficking with Williamson County Circuit Court, in the state of Tennessee. To date,  
16 **NYANGORO** remains in custody with Williamson County Jail.

17 31. Search warrants for two residences connected to **NYANGORO** were signed by United  
18 States Magistrate Judge Alistair Newbern, of the Middle District of Tennessee. The residences searched  
19 were 404 Vienna Court, Franklin, Tennessee (Vienna Court), and 755 Saint Andrews Drive, Apartment  
20 18-101, Murfreesboro, Tennessee (Saint Andrews Drive). Vienna Court was the primary residence of  
21 **NYANGORO**, while Saint Andrews Drive was identified as the residence of a relative of  
22 **NYANGORO**, DIANA MAGEMBE. MAGEMBE was identified by Williamson County Jail as the  
23 individual who took possession of **NYANGORO**'s personal effects after he was taken into custody on  
24 August 18, 2023. MAGEMBE's residence was identified through open-source reporting, and  
25 surveillance conducted by agents of FBI Nashville. On September 26, 2023, with the assistance of FBI  
26 Nashville, these search warrants were executed in effort to obtain **NYANGORO**'s electronic devices.  
27 Among the devices seized was an Apple iPhone 13 Pro Max, with serial number GJDXJ6J7Q9. This  
28 device was seized from the Saint Andrews Drive residence.

1       32. In reviewing **NYANGORO**'s iPhone 13 Max, I found a WhatsApp conversation between  
2 **NYANGORO** and an individual named PETER ACHA that occurred on dates between September 23-  
3 28<sup>th</sup>, 2020:

4           ACHA:       You remember we talked earlier about \$200 invoice right? Payment will  
5 be tomorrow and amount updated to \$274 as per below invoice. 274k for regions bank. The  
6 invoice job

7           **NYANGORO:** [Here, **NYANGORO** shared and referenced a photograph of the image  
8 shown in Figure 5] This means they have diverted the funds payable to Turning Point to us.  
9 When these Turning Point guys realize their account never received the funds, the County of  
10 Fresno would try and recall their funds. My impression was that these guys would add our name  
11 into the vendor list and create an invoice for payment that way.

12          ACHA:       They told me, it's not diverted funds but uses the information to apply for  
13 the funds. And it's twice monthly payment to note. We are also expecting the \$1M information  
14 as well. Maybe you don't send it to your guy please

15          **NYANGORO:**       So they have exploited the Account Payable (AP) and Account  
16 Receivable (AC) system for the County of Fresno. And are supplying bogus claims to it.  
17 Brilliant. Did you know that I actually built the Enterprise Performance Management (EPM)  
18 system, which is the backend system for the County of Fresno back in 2006? It's the system that  
19 AC, AP, FSCM, HCM, etc feeds into for Planning and Budgeting and Reporting. It means these  
20 invoices are actually being paid out of the system I actually built for them. I worked with  
21 Oracle's PeopleSoft system

22          ACHA:       Good hand work, it's time to use the knowledge for our continent brother.

23          **NYANGORO:**       I'm an expert on these Enterprise Resource Planning (ERP)  
24 systems brother. Once upon a time, I actually was one of the few highly sought consultant for  
25 both Oracle and SAP. Sure, I could build similar systems for Africa. That would be our next  
26 chapter. So your guys control that P.O. Box 447? Because a physical copy of the invoice would  
27 be mailed out to that address.

28          ACHA:       They control P.O. Box 447, so no worries!

1                    ACHA:         Once the funds arrive, let me know in order to program them. Arrange all  
2 payment for early next week, no rushing. I will control accordingly. Both payment would repeat  
3 on month, just to let him know.

4                    **NYANGORO:**      The guy has said funds are pending in the account. Everything  
5 should get posted tonight. Now let's talk about the distribution. I'm meeting him for lunch  
6 shortly

7                    ACHA:              Thank god. 50% to sender, 40% to the receiver, 5% for you and I,  
8 5% for the UK group

9                    33.        In the conversation above, ACHA appears to reference a prior discussion, and informs  
10 **NYANGORO** to expect a payment to his Regions account of \$274 (thousand). ACHA and  
11 **NYANGORO** both reference a screenshot of an invoice, also shown in Figure 5 of this document.  
12 Figure 5 shows a payment invoice from Fresno County, with Turning Point listed as the supplier.  
13 **NYANGORO** then appears to discuss the actions of other conspirators, and states that "they" seemed to  
14 have diverted funds intended for Turning Point, and explains that he assumed "they" would just add a  
15 new business (presumably controlled by ACHA and **NYANGORO**) to Fresno County's vendor list.  
16 ACHA states that they are expecting up to \$1 million from this scheme, and also claims that the funds  
17 are not diverted. **NYANGORO** then further speculates on how the other conspirators might have  
18 accomplished this, and shares that he once helped Fresno County set up their Enterprise Performance  
19 Management System. ACHA provides details to **NYANGORO** on how the funds, once received, should  
20 be divided.

21                    34.        Earlier in the same WhatsApp conversation, on September 16, 2020, **NYANGORO**  
22 provided information for a Regions Bank account to ACHA. This information included the account  
23 name of Andover Acquisitions group, and an account number of 0289519361. This matches the bank  
24 account attributed to **NYANGORO**, described in paragraph 18. I searched "Andover Acquisitions" on  
25 the business search function of the Tennessee Secretary of State website, and found that it was registered  
26 to 404 Vienna Court, Franklin, Tennessee, known as the primary residence of **NYANGORO**.

27                    35.        In the same WhatsApp conversation, between September 23-26, 2023, ACHA went on to  
28 provide specific bank accounts to which **NYANGORO** was to transfer the received funds. These

1 included accounts belonging to named entities of: Iftikhar Malik, Seven Star Sport USA Inc., and  
2 Modesty International. All of these accounts were observed in **NYANGORO's** bank account records as  
3 receiving wire transfers in the days following the receipt of wire transfers from Fresno County.

4       36. From October 14 through October 16, 2020, ACHA and **NYANGORO** had additional  
5 discussions via WhatsApp messaging chats concerning the wire fraud involving Fresno County:

6                   **NYANGORO:** [included a screenshot of a Regions bank account showing  
7 payment reversals, as show in Figure 6.] We're in deep shit. The last 3 transactions from County  
8 of Fresno have been reversed. Please call me ASAP.

9                   ACHA: There are checking with sender, I will revert ASAP!

10                  **NYANGORO:** The key here is to be transparent among ourselves. There's honor code  
11 among thieves. Let them tell us exactly what went wrong with these last 3 transactions. I know  
12 the County of Fresno and Regions Bank would report this matter to the authorities. And every  
13 transaction has passed thru my JSN Ventures account on its way out. So there's no escaping it.  
14 Maybe we could buy some time until we're able to repay the bank after our trading settles.

15                  ACHA: Exactly bro. W would handle the situation, don't panic! Accept my  
16 deepest regrets.

17                  **NYANGORO:** [in response to a voice message from ACHA] He's bullshitting  
18 around. What he's saying doesn't make any sense. The problem is not with the Regions account.  
19 The 1M successfully entered the account last week. And was subsequently paid out 2 days later.  
20 Regions would never reverse an invoice job that has entered the business account more than  
21 week later.

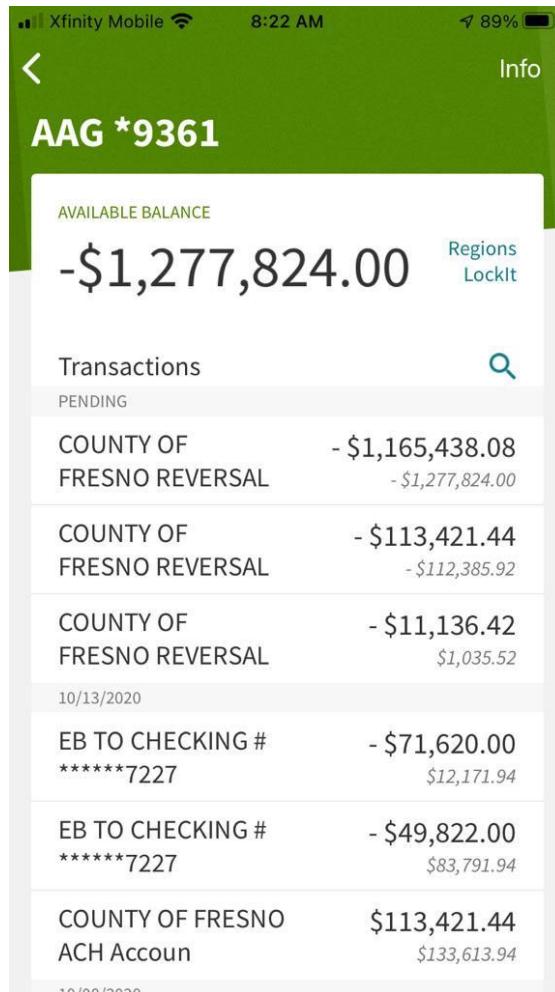
22                  **NYANGORO:** The Regions account has been blocked by the bank security. Jeff  
23 (the account owner) and I went to the bank today. The branch manager has submitted a ticket  
24 requesting additional information from the bank security. The turnaround time is within 24  
25 hours.

26                  ACHA: Thanks bro

1           **NYANGORO:**       I'm frustrated that your guys are not telling us as to why County of  
 2 Fresno tried to reverse the deposit and did put a hold on transferring the funds into the account to  
 3 begin with.

4           ACHA:       Let me do the best I can to get more information.

5           ACHA:       They actually intercepted the email of the main company doing business  
 6 with the state company in that state. Payment are then channels to any open beneficiary account  
 7 within their reach.



23           **Figure 6- Screenshot of Regions bank account, ending in -9361, showing a series of reversals made  
 24 by County of Fresno.**

25       37.       In the conversation above, **NYANGORO** realizes that Fresno County reversed a series  
 26 of payments made to his account, and intended for Turning Point. **NYANGORO** complains to ACHA  
 27 that he will be implicated as every transaction involving the funds passed through his business account.  
 28 **NYANGORO** describes steps that he's taken to remedy the situation, and places blame on ACHA's

1 “guys” for the deposits being reversed. **NYANGORO** states that there should be “honor among thieves”  
2 and argues that ACHA should hold his “guys” responsible for explaining what went wrong. ACHA then  
3 informs **NYANGORO** that his guys were able to obtain the funds by intercepting the email of the “main  
4 company” during business with Fresno County (presumably Turning Point), and describes what appears  
5 to be a BEC.

6       38. On December 13, 2024, a custodial interview was conducted of **NYANGORO** by agents  
7 of the FBI Nashville Field Office. The interview took place at Williamson County Jail, Tennessee. After  
8 being advised of his rights, **NYANGORO** was shown a copy of the WhatsApp conversation detailed  
9 above. After viewing this conversation, **NYANGORO** admitted that he had knowingly acted as a  
10 “mule” for ACHA. Based on my training and experience, I know that “mule” refers to a “money mule”—  
11 someone who transfers or moves money obtained illegally by someone else. **NYANGORO** explained  
12 that ACHA had given him instructions on where the money should be sent. He defined the “sender” as  
13 the person who had access to the compromised email account, and who sent the ACH change requests to  
14 Fresno County. **NYANGORO** defined the “receiver” as the entity who had knowledge that an  
15 organization has funds that could be stolen, and who typically also has information on vulnerabilities  
16 that can be exploited. He stated that “UK Group” worked frequently with both the “sender” and the  
17 “receiver”. **NYANGORO** further explained that, for these types of schemes, most communication  
18 occurs one-on-one through services such as WhatsApp, as opposed to group chats.

19                          IV. CONCLUSION

20       39. Based on the information in this affidavit, I believe there is probable cause to believe that  
21 **NYANGORO** conspired with others to commit wire fraud in violation of Title 18 United States Code,  
22 Section 1349, by devising and executing a scheme to defraud with the intent to obtain money by  
23 fraudulent pretenses and transmit the money by means of wire transmissions.

24       ///

25       ////

26       ///

27       ////

28

40. I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

Respectfull

*Jillian D. Doring*

Jessica Downing  
Special Agent, FBI Fresno

Affidavit submitted by email/pdf and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3), on January 31, 2025.

B. McAuliffe

Honorable Barbara A. McAuliffe  
United States Magistrate Judge

Reviewed and approved as to form:

/s/ David Gappa  
David Gappa  
Assistant U.S. Attorney